

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS (Worcester)**

Anthony Campbell,)	
)	
Plaintiff,)	
vs.)	
)	Case No. 04-40236 FDS
)	
Isolation Technologies, Inc.)	
Larry D'Amato)	
Defendants)	

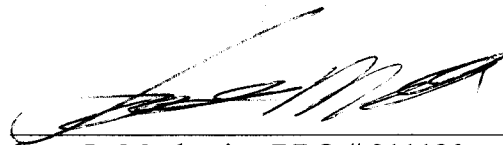
**DEFENDANT ISOLATION TECHNOLOGIES, INC.'s MOTION TO STRIKE
LETTER/REQUEST FROM ANTHONY CAMPBELL**

Now come the Defendant Isolation Technologies, Inc. and hereby moves for an order that the Letter/Request from Plaintiff Anthony Campbell dated June 29, 2005, and the materials accompanying that letter, be stricken from this matter, and that the Plaintiff be ordered to take no further actions with respect to Attorney Peter Harney. Furthermore, Defendants request that the Court inquire of Plaintiff as to whether he has made any similar allegations of wrongdoing by Attorney Harney to any other judicial, administrative or other governmental body, and, if so, that he be ordered to withdraw those allegations.

As grounds therefore, as outlined in the accompanying Affidavit from Attorney Harney, Attorney Harney has never appeared before the Massachusetts Commission Against Discrimination, has not filed an appearance or otherwise been involved with this litigation, and, to the best of his knowledge, has never met or spoken with Plaintiff Anthony Campbell. Therefore, if Plaintiff has any concerns about any alleged

wrongdoing by any attorney, which the Defendants deny, it is clear that Attorney Harney played no part in them, and he should be absolved of any allegations in this matter.

Respectfully submitted
Isolation Technologies, Inc.
By its attorneys



Scott L. Machanic BBO # 311120
Cunningham, Machanic, Cetlin,
Johnson & Harney, LLP
220 N. Main Street
Natick, MA 01760
(508) 651-7524

CERTIFICATE OF SERVICE

I hereby certify that I gave notice to all parties to this action of the filing of this Motion by mailing a copy, first class United States mail, postage pre-paid, to the Plaintiff at the following address:

Anthony Campbell
PO Box 3469
Worcester, MA 01613

Signed under the pains and penalties of perjury this 8th day of July, 2005.



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